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Jordan Fletcher, Principal

May 27, 2025

VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 11C South
Brooklyn, NY 11201
Kuo_Chambers@nyed.uscourts.gov

Re: *City of New York, et al. v. Henriquez*, 22 Civ. 3190-KAM-PK (EDNY)
Joint Status Letter re Website Issues and Request for Extension of Time

Dear Judge Kuo,

I write on behalf of defendant Juan Henriquez, and with the consent of counsel for the City of New York, to update the Court on the status of the parties' discussions concerning the FDNY Foundation's website and other technical issues raised by Mr. Henriquez's proposed motion for contempt.

Counsel for the parties have continued to attempt to work through their disagreements with respect to the Foundation's website. Following the initial phone conference on May 6, 2025, the parties exchanged additional substantive email proposals and responses on May 9 (Foundation), May 13 (Henriquez), and May 22 (Foundation).

As of this writing, the parties continue to discuss what additional changes should be made to the Foundation's website. However, while the parties have not yet reached full agreement, neither has any impasse been definitively crystalized. We therefore still do not believe that it would be appropriate to bring the in-progress issues to the Court's attention at this time.

Because the Parties are simultaneously briefing cross-motions to dismiss at this moment, **the Parties respectfully request an extension until June 17, 2025, to raise any outstanding issues with the Court.** This is the parties' second request for an extension of the Court's original deadline.

Respectfully submitted,

Jordan Fletcher